
IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No.: 18-02548
Karoline Esho)	
)	Chapter 13
)	
Debtor(s))	Judge: LaShonda A. Hunt
)	

NOTICE OF MOTION

TO: Karoline Esho, 6005 N Kimball, Apt 4 Chicago, IL 60659 *via mail*
Trustee Marilyn Marshall, 224 S. Michigan Ave., #800, Chicago, IL 60604 *via ECF clerk's electronic delivery system*
Brian J. Graber, 150 N Michigan Ave, Chicago, IL 60601 *via mail*
U.S. Trustee, 219 S. Dearborn Suite 873, Chicago IL 60604 *via ECF clerk's electronic delivery system*

PLEASE TAKE NOTICE that on **May 13, 2019 at 9:30 am.**, I shall appear before the Honorable Judge LaShonda A. Hunt at the Dirksen Federal Court, 219 S. Dearborn, Courtroom 719, Chicago, Illinois 60604 or any judge presiding and then and there present the **Motion**, a copy of which is attached hereto.

By: /s/ David H. Cutler
David H. Cutler

CERTIFICATE OF SERVICE

I, David H. Cutler, hereby certify that I caused to be served, electronically or through U.S. Mail, a copy of the foregoing Notice and Motion upon the parties named above on April 26, 2019 before the hour of 8:00 p.m.

By: /s/ David H. Cutler
David H. Cutler, esq.
Counsel for Debtor(s)
Cutler & Associates, Ltd.
4131 Main St.
Skokie, IL 60076
Phone: (847) 673-8600

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MOTION TO APPROVE SETTLEMENT

NOW COMES the Debtor, Karoline Esho, (hereinafter referred to as “Debtor”), by and through her attorneys, The Law Offices of Cutler & Associates, Ltd., to present this Motion and state as follows:

1. On January 30, 2018, the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.
2. This Honorable Court confirmed the Debtor’s Chapter 13 plan on March 19, 2018.
3. The Debtor has hired the law firm of Brian J. Graber, Ltd., to pursue a wrongful termination claim due to unlawful termination of her employment.
4. The Debtor has received a settlement offer in the amount of \$20,000. Total settlement \$20,000 less \$8,000 to debtor's wrongful termination attorney for fees and litigation expenses, \$6,000 to debtor as "wage damages" subject to W-2 withholding taxes, \$6,000 to debtor as "non-economic damages" subject to 1099 in which no taxes will be taken out and debtor will need to pay Illinois and Federal taxes.
5. The Debtor respectfully requests that this Court allow her to accept the settlement of her wrongful termination claim.

WHEREFORE, Debtor prays that this Honorable Court enter an Order allowing the Debtor to accept the settlement of her wrongful termination claim and for such further relief that this Court may deem just and proper.

Dated: April 26, 2019

Respectfully Submitted,

/s/ David H. Cutler
David H. Cutler, esq.,
Counsel for Debtor(s):
Cutler & Associates, Ltd.
4131 Main St.
Skokie, IL 60076
Phone: (847) 673-8600